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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

| | |
|---|---|
| GREGG SCHUMACHER and LINDA) | CV No. CV-07-00601-HU |
| SCHUMACHER, individually and as) | |
| husband and wife, and GREGG) | SPECIAL MOTION TO STRIKE |
| SCHUMACHER FURS LLC dba) | (ORS 31.150, Anti-Slapp) |
| SCHUMACHER FURS & OUTERWEAR,) | |
| Plaintiffs) | |
| v.) | Oral Argument Requested |
|) | |
| CITY OF PORTLAND, a municipal) | On behalf of defendants In Defense of . |
| corporation; IN DEFENSE OF ANIMALS,) | Animals (IDA), Rossell, Durkee and Mieras |
| a foreign nonprofit corporation; ANIMAL) | |

LIBERATION FRONT, an unincorporated)
association; PEOPLE FOR THE ETHICAL)
TREATMENT OF ANIMALS, INC., a)
foreign nonprofit corporation; MATT)
ROSSELL; KEVIN MIERAS aka "Bluejay";)
CONNIE DURKEE; ALEX LILLI; JOHN)
DOES 1-10; and JANE DOES 1-10)
Defendants.)

LR 7.1 CERTIFICATION

The undersigned counsel of record for defendants hereby affirms that the parties made a good faith effort through a telephone conference on May 11, 2007 between the undersigned and counsel for plaintiffs to resolve the disputes raised by this Motion and have been unable to do so.

ISSUES TO BE DECIDED

1. Whether plaintiffs' claims, or any of them, arise out of any oral statements made, or written documents presented, in a place open to the public or a public forum in connection with an issue of public interest.
2. Whether plaintiffs' claims, or any of them, arise out of conduct in furtherance of the exercise of the constitutional right of free speech in connection with a public issue or an issue of public interest.

MOTION

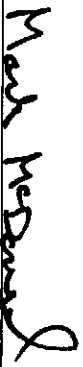
Pursuant to ORS 31.150(1), defendants specially move to strike plaintiff's complaint on the grounds that this action arises out of conduct in furtherance of the exercise of the constitutional right of free speech in connection with a public issue or an issue of public

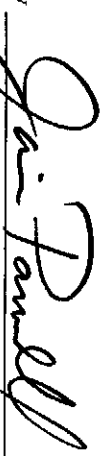
interest under ORS 31.150(2)(d) and/or this action arises out of oral statements made or written statements or other documents presented, in a place open to the public or a public forum in connection with an issue of public interest under ORS 31.150 (2)(c).

Defendants are filing this motion within 60 days of the earliest date on which plaintiff served this action. This motion is timely under ORS 31.152.

This Motion is based on the accompanying Memorandum in Support, and on the records, files, and pleadings in this case. Defendants are further entitled to a stay of discovery under ORS 31.152 (2). Defendants request and are entitled to attorney fees and costs under ORS 31.152 should they prevail on this motion.

DATED: May 11, 2007

By 
Mark G. McDougal, OSB #89086
Natalie McDougal, OSB #04250
Gregory Kafoury, OSB #74166
Attorneys for defendants IDA, ROSSELL
and DURKEE..

By 
Jami Pannell, OSB #06429
Shauna Curphey, OSB #06306
Attorneys for defendant MIERAS

CERTIFICATE OF SERVICE

I hereby certify that I served a true copy of the foregoing Special Motion to Strike on the following person(s) on the date indicated below, by the following method:

[X] by electronically mailed notice from the court on the date set forth below;

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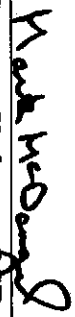
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DATED: May 11, 2007


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